

HUSCH BLACKWELL LLP

David Stauss (NJ I.D. #013862005)
 1801 Wewatta Street, Suite 1000
 Denver, CO 80202
 Telephone: 303.749.7200
 Facsimile: 303.749.7272
 Email: david.stauss@huschblackwell.com

HUSCH BLACKWELL LLP

Caleb T. Holzaepfel, Esq.
 Admitted *pro hac vice*
 736 Georgia Avenue, Suite 300
 Chattanooga, Tennessee 37402
 Telephone: 423.755.2654
 Email: caleb.holzaepfel@huschblackwell.com

Attorneys for Safety National Casualty Corporation

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEW JERSEY**

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In re	:	Chapter 11
	:	
BED BATH & BEYOND INC., <i>et al.</i> ,	:	Case No. 23-13359 (VFP)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	:	Hearing Date: 5/7/2024 at 10:00 a.m.
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**SAFETY NATIONAL CASUALTY CORPORATION’S JOINDER TO PLAN
 ADMINISTRATOR’S SUPPLEMENTAL OPPOSITION TO AMENDED MOTION FOR
 RELIEF FROM AUTOMATIC STAY**

Safety National Casualty Corporation (“Safety National”), by and through the undersigned counsel, hereby joins in the Plan Administrator’s *Supplemental Opposition to Amended Motion for Relief From Automatic Stay* (Dkt. 2987) (the “Objection”) to the *Amended*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 and Request for Waiver of 14 Day Stay Imposed by Bankruptcy Rule 4001(a)(3) [Docket No. 2723] (the “Motion”) filed by Penelope and Joseph Duczkowski (“Movants”). In support of this Joinder, Safety National states as follow:

1. Safety National hereby joins in and incorporates herein by reference the relevant arguments in the Objection that relief from the Plan Injunction should be denied as there is no likely no insurance for Movant’s – and no payment from Debtors will reach the SIR limit.

2. Safety National reserves any and all rights to supplement and/or amend this Joinder and expressly reserves the right to raise any additional objections with respect to the Motion and objects to the relief requested and/or such relief that may subsequently be sought by the Debtors and/or any other party, as such requested relief relates to the Motion and/or the interest of Safety National.

3. Moreover, as of the filing of this Joinder, no proposed stipulation has been filed on the docket as to the Motion. Safety National objects to any proposed order that attempts to modify the rights or defenses held by Safety National under the Safety National any applicable insurance policy or contractual agreements between the Debtors and Safety National, the Bankruptcy Code, or other applicable law. Accordingly, Safety National hereby expressly reserves all of it rights, claims, counterclaims, defenses, and remedies under the Bankruptcy Code, its insurance policy, any applicable contractual agreements between the Debtors and Safety National, and other applicable law.

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Dated: April 24, 2024

Respectfully Submitted,

/s/ David Stauss

David Stauss (NJ I.D. #013862005)

HUSCH BLACKWELL LLP

1801 Wewatta Street, Suite 1000

Denver, CO 80202

T: 303.749.7200; F: 303.749.7272

Email: david.stauss@huschblackwell.com

Caleb T. Holzaepfel, Esq. (admitted *pro hac vice*)

HUSCH BLACKWELL LLP

736 Georgia Avenue, Suite 300

Chattanooga, Tennessee 37402

T: 423.755.2654; F: 423.266.5500

Email: caleb.holzaepfel@huschblackwell.com

Attorneys for Safety National Casualty Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this the 24th day of April, 2024, a true and correct copy of Safety National's *Joinder* has been electronically filed with the Court via the CM/ECF system and will be served by electronic means through the CM/ECF system to the below and to all registered CM/ECF participants.

Debtors' Counsel

Kirkland & Ellis LLP
Attn: Joshua A. Sussberg,
Attn: Emily E. Geier
Attn: Derek I. Hunter
601 Lexington Avenue
New York, New York 10022
joshua.sussberg@kirkland.com
emily.geier@kirkland.com
derek.hunter@kirkland.com

United States Trustee

Fran B. Steele, Esq.
Alexandria Nikolinos
One Newark Center, Suite 2100
Newark, NJ 07102
Fran.B.Steele@usdoj.gov
alexandria.nikolinos@usdoj.gov

Counsel to Movants

David B. Pizzica, Esq.
Pansini Law Group
Pansini & Pizzica
1525 Locust Street, 15th Floor
Philadelphia, PA 19102
Email: dpizzica@pansinilaw.com

Debtors' Counsel

Cole Schotz P.C.
Michael D. Sirota
Warren A. Usatine
Felice R. Yudkin
25 Main Street Hackensack
New Jersey 07601
msirota@coleschotz.com
wusatine@coleschotz.com
fyudkin@coleschotz.com

Counsel to the Plan Administrator

Robert J. Feinstein
Bradford J. Sandler
Pachulski Stang Ziehl & Jones LLP
780 Third Avenue, 34th Floor
New York, NY 10017
rfeinstein@pszjlaw.com
bsandler@pszjlaw.com

/s/ David Stauss

David Stauss (NJ I.D. #013862005)